



August 30, 2006

Mr. George H. Person
Chief, Recall Management Division
Office of Defects Investigation
Enforcement

Re: Silverado Replacement Headlamps
NHTSA Campaign No. 06E - 075

Dear Mr. Person,

I received your letter of August 29, 2006 and I would like to take exception to the verbiage under the heading: Consequence. Specifically, we would like for the phrase "Possibly resulting in a vehicle crash" to be replaced by "Possibly resulting in disturbing glare."

Our rationale for this change is as follows:

The noncompliance to FMVSS 108 photometry specifications concerned discrepant performance at test points that limit the amount of light in certain areas of the beam pattern in order to avoid glare to both oncoming and preceding traffic.

Headlamp misaim has been identified as one of the potential causes for headlamp glare and is indeed the cause in this instance. Production variation resulted in approximately 25 percent of the low beams having an aim shift up to 0.15 degrees.

The consequences of glare are varied and may include such effects as causing oncoming traffic to mistakenly signal the driver to dim to low beam and look away or cause preceding traffic to adjust their rear view mirrors. (Ref. NHTSA Forward Lighting Research Report, Perel, July 31, 2003, www-nrd.nhtsa.dot.gov/pdf/nrd-01/NRDmtgs/2003/0703Perel.pdf)

However, there is a distinct lack of objective data that demonstrates glare adversely affects vehicle safety. Basically, neither the lighting industry nor NHTSA is aware of any evidence that demonstrates the existence of disabling glare from headlamps. (Ref. NHTSA workshop on Headlamp Safety Metrics, Karbowski, July 13, 2004, www-rd.nhtsa.dot.gov/pdf/nrd-01/headlamp/karbowski.pdf)

In addition to this requested change, we would like to inform you that recall notices will be sent to our customers General Motors and Kaper II. We are not aware of any end users.

Thank you in advance for considering our change request.

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